



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

LF:AEG/SD  
F.#2007R02181

271 Cadman Plaza East  
Brooklyn, New York 11201

November 13, 2009

**By Hand and ECF**

The Honorable Sterling Johnson, Jr.  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Thomas Archer et al.  
Criminal Docket No. 08-288 (S-1)(SJ)

Dear Judge Johnson:

The government has reviewed the proposed Voir Dire filed by defendant Thomas Archer. The government objects to questions one and five, which directly address the interactions between Archer and clients who retained him as a lawyer. Such case specific questions are inappropriate for Voir Dire. If the Court is inclined to Voir Dire potential jurors about their views of lawyers, the government proposes the following question:

The defendant is an attorney who practiced immigration law. Do you have any views or feelings about attorneys which would prevent you from keeping an open mind during the course of the trial?

Respectfully submitted,

BENTON J. CAMPBELL  
United States Attorney

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